

Exhibit A

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
1							Privileged		Copy of a draft HD 109	Document constitutes "All versions of maps and related documents produced during the course of the development, design, and/or revisions of H. 4493" and, pursuant to the Court's Order (ECF No. 153) must be produced. Documents are also not a communication between legislators or between legislators and immediate staff (<i>Bethune-Hill v. Va. State Bd. of Elections</i> , 144 F. Supp. 2d 323, 343 (E.D. Va. 2015); draft map would contain "strictly factual information" and/or non-privileged information that were relied upon by legislators (<i>Id.</i> (citing <i>Comm. for Fair and Balanced Maps v. Ill. State Bd. of Elections</i> , 2011 WL 4837508, at *9 (N.D. Ill. Oct. 12, 2011)); documents could have been produced by "committee, technical, or professional staff for the House (excluding the personal staff of legislators) that reflect opinions, recommendations, or advice" (<i>Id.</i>); document may "'reveal[] an awareness' of: racial considerations employed in the districting process, sorting of voters according to race, or the impact of redistricting upon the ability of minority voters to elect a candidate of choice" (<i>Id.</i> at 344); document could "reflect a violation of the Equal Protection Clause of the Fourteenth Amendment" (<i>City of Greensboro v. Guilford Cnty. Bd. of Elections</i> , 2016 WL 11660626, at *5 (M.D.N.C. Dec. 20, 2016).
2							Privileged		Copy of a draft HD 55	Same
3							Privileged		Copy of a draft HD 101	Same
4							Privileged		Copy of a draft HD 101	Same
5							Privileged		Copy of a draft HD 86	Same
6							Privileged		Copy of a draft HD 101	Same
7							Privileged		Copy of a draft HD 101	Same
8							Privileged		Copy of a draft HD 101	Same
9							Privileged		Copy of a draft HD 86	Same
10							Privileged		Copy of a draft HD 67	Same
11							Privileged		Copy of a draft HD 23	Same
12							Privileged		Copy of a draft HD 25	Same
13							Privileged		Copy of a draft HD 25	Same
14							Privileged		Copy of a draft HD 19	Same
15							Privileged		Copy of a draft HD 17	Same
16							Privileged		Copy of a draft HD 23	Same
17							Privileged		Copy of a draft HD 24	Same
18							Privileged		Copy of a draft HD 25	Same
19							Privileged		Copy of a draft HD 25	Same
20							Privileged		Copy of a draft HD 35	Same
21							Privileged		Copy of a draft HD 27	Same
22							Privileged		Copy of a draft HD 16	Same
23							Privileged		Copy of a draft HD 16	Same
24							Privileged		Copy of a draft HD 28	Same
25							Privileged		Copy of a draft HD 28	Same
26							Privileged		Copy of a draft HD 58	Same

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
27							Privileged		Copy of a draft HD 58	Same
28							Privileged		Copy of a draft HD 105	Same
29							Privileged		Copy of a draft HD 104	Same
30							Privileged		Copy of a draft HD 56	Same
31							Privileged		Copy of a draft HD 113	Same
32							Privileged		Copy of a draft HD 91	Same
33							Privileged		Copy of a draft HD 113	Same
34							Privileged		Copy of a draft HD 121	Same
35							Privileged		Copy of a draft HD 79	Same
36							Privileged		Copy of a draft HD 51	Same
37							Privileged		Copy of a draft HD 79	Same
38							Privileged		Copy of a draft HD 87	Same
39							Privileged		Copy of a draft HD 102	Same
40							Privileged		Copy of a draft HD 32	Same
41							Privileged		Copy of a draft HD 84	Same
42							Privileged		Copy of a draft HD 49	Same
43							Privileged		Copy of a draft HD 08	Same
44							Privileged		Copy of a draft HD 10	Same
45							Privileged		Copy of a draft HD 41	Same
46							Privileged		Copy of a draft HD 77	Same
47							Privileged		Copy of a draft HD 47	Same
48							Privileged		Copy of a draft HD 60	Same
49							Privileged		Copy of a draft HD 60	Same
50							Privileged		Copy of a draft HD 12	Same
51							Privileged		Copy of a draft HD 60	Same
52							Privileged		Copy of a draft HD 63	Same
53							Privileged		Copy of a draft HD 103	Same
54							Privileged		Copy of a draft HD 12	Same
55							Privileged		Copy of a draft HD 78	Same
56							Privileged		Copy of a draft HD 75	Same
57							Privileged		Copy of a draft HD 15	Same
58							Privileged		Copy of a draft HD 15	Same
59							Privileged		Copy of a draft HD 118	Same
60							Privileged		Copy of a draft HD 120	Same
61							Privileged		Copy of a draft HD 82	Same
62							Privileged		Copy of a draft HD 83	Same
63							Privileged		Copy of a draft HD 86	Same
64							Privileged		Copy of a draft HD 117	Same
65							Privileged		Copy of a draft HD 83	Same
66							Privileged		Copy of a draft HD 82	Same
67							Privileged		Copy of a draft HD 95	Same
68							Privileged		Copy of a draft HD 95	Same
69							Privileged		Copy of a draft HD 12	Same
70							Privileged		Copy of a draft HD 24	Same
71							Privileged		Copy of a draft HD 12	Same
72							Privileged		Copy of a draft HD 96	Same
73							Privileged		Copy of a draft HD 81	Same

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
74							Privileged		Copy of a draft HD 49	Same
75							Privileged		Copy of a draft HD 102	Same
76							Privileged		Copy of a draft HD 10	Same
77							Privileged		Copy of a draft HD 15	Same
78							Privileged		Copy of a draft HD 52	Same
79							Privileged		Copy of a draft HD 93	Same
80							Privileged		Copy of a draft HD 95	Same
81							Privileged		Copy of a draft HD 64	Same
82							Privileged		Copy of a draft HD 51	Same
83							Privileged		Copy of a draft HD 50	Same
84							Privileged		Copy of a draft HD 92	Same
85							Privileged		Copy of a draft HD 52	Same
86							Privileged		Copy of a draft HD 102	Same
87							Privileged		Copy of a draft HD 57	Same
88							Privileged		Copy of a draft HD 99	Same
89							Privileged		Copy of a draft HD 90	Same
90							Privileged		Copy of a draft HD 90	Same
91							Privileged		Copy of a draft HD 95	Same
92							Privileged		Copy of a draft HD 57	Same
93							Privileged		Copy of a draft HD 55	Same
94							Privileged		Copy of a draft HD 101	Same
95							Privileged		Copy of a draft HD 37	Same
96							Privileged		Copy of a draft HD 38	Same
97							Privileged		Copy of a draft HD 95	Same
98							Privileged		Copy of a draft HD 37	Same
99							Privileged		Copy of a draft HD 38	Same
100							Privileged		Copy of a draft HD 78	Same
101							Privileged		Copy of a draft HD 58	Same
102							Privileged		Copy of a draft HD 57	Same
103							Privileged		Copy of a draft HD 117	Same
104							Privileged		Copy of a draft HD 123	Same
105							Privileged		Copy of a draft HD 70	Same
106							Privileged		Copy of a draft HD 75	Same
107							Privileged		Copy of a draft HD 25	Same
108							Privileged		Copy of a draft HD 25	Same
109							Privileged		Copy of a draft HD 85	Same
110							Privileged		Copy of a draft HD 40	Same
111							Privileged		Copy of a draft HD 69	Same
112							Privileged		Copy of a draft HD 89	Same
113							Privileged		Copy of a draft HD 92	Same
114							Privileged		Copy of a draft HD 97	Same
115							Privileged		Copy of a draft HD 97	Same
116							Privileged		Copy of a draft HD 87	Same
117							Privileged		Copy of a draft HD 92	Same
118							Privileged		Copy of a draft HD 110	Same
119							Privileged		Copy of a draft HD 33	Same
120							Privileged		Copy of a draft HD 110	Same

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
121							Privileged		Copy of a draft HD 42	Same
122							Privileged		Copy of a draft HD 42	Same
123							Privileged		Copy of a draft HD 57	Same
124							Privileged		Copy of a draft HD 54	Same
125							Privileged		Copy of a draft HD 109	Same
126							Privileged		Copy of a draft HD 70	Same
127							Privileged		Copy of a draft HD 70	Same
128							Privileged		Copy of a draft HD 79	Same
129							Privileged		Copy of a draft HD 109	Same
130							Privileged		Copy of a draft HD 38	Same
131							Privileged		Copy of a draft HD 61	Same
132							Privileged		Copy of a draft HD 105	Same
133							Privileged		Copy of a draft HD 21	Same
134							Privileged		Copy of a draft HD 58	Same
135							Privileged		Copy of a draft HD 27	Same
136							Privileged		Copy of a draft HD 70	Same
137							Privileged		Copy of a draft HD 26	Same
138							Privileged		Copy of a draft HD 29	Same
139							Privileged		Copy of a draft HD 25	Same
140							Privileged		Copy of a draft HD 47	Same
141							Privileged		Copy of a draft HD 25	Same
142							Privileged		Copy of a draft HD 46	Same
143							Privileged		Copy of a draft HD 48	Same
144							Privileged		Copy of a draft HD 40	Same
145							Privileged		Copy of a draft HD 116	Same
146							Privileged		Copy of a draft HD 54	Same
147							Privileged		Copy of a draft HD 82	Same
148							Privileged		Copy of a draft HD 53	Same
149							Privileged		Copy of a draft HD 55	Same
150							Privileged		Copy of a draft HD 110	Same
151							Privileged		Copy of a draft HD 45	Same
152							Privileged		Copy of a draft HD 39	Same
153							Privileged		Copy of a draft HD 91	Same
154							Privileged		Copy of a draft HD 82	Same
155							Privileged		Copy of a draft HD 106	Same
156							Privileged		Copy of a draft HD 107	Same
157							Privileged		Copy of a draft HD 124	Same

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
158							Privileged		Population data details for a draft HD 68	Same -- population data constitutes "All versions of maps and related documents produced during the course of the development, design, and/or revisions of H. 4493" and likely "relate[s] . . . to the intent behind any proposed design and/or revision of the H. 4493 or any individual district referenced in Plaintiffs' Amended Complaint." Pursuant to the Court's Order (ECF No. 153), this data must be produced. Also, population data is "strictly factual information" that was "available to lawmakers at the time a decision was made" and should not be protected by legislative privilege (Bethune-Hill v. Va. State Bd. of Elections, 144 F. Supp. 2d 323, 343 (E.D. Va. 2015) (citing Comm. for a Fair & Balanced Map, 2011 WL 4837508, at *9))
159							Privileged		Copy of a draft 35	Same (see objection to Privilege Log No. 1)
160							Privileged		Copy of a draft 68	Same
161							Privileged		Copy of a draft 34	Same
162							Privileged		Copy of a draft 07	Same
163							Privileged		Copy of a draft 07	Same
164							Privileged		Copy of a draft 41	Same
165							Privileged		Copy of a draft 43	Same
166							Privileged		Copy of a draft 61	Same
167							Privileged		Population data details for a draft HD 1, 2, 3, 4, 5, 6 and 7	Same (see objection to Privilege Log No. 158)
168							Privileged		Copy of a draft 59	Same (see objection to Privilege Log No. 1)
169							Privileged		Copy of a draft 03	Same
170							Privileged		Copy of a draft Congressional Plan	Same
171							Privileged		Copy of a draft HD 86	Same
172							Privileged		Copy of a draft HD 49	Same
173							Privileged		Copy of a draft HD 84	Same
174							Privileged		Copy of a draft HD 26	Same
175							Privileged		Copy of a draft HD 83	Same
176							Privileged		Copy of a draft HD 41	Same
177							Privileged		Copy of a draft HD 82	Same
178							Privileged		Copy of a draft HD 81	Same
179							Privileged		Copy of a draft HD 6	Same
180							Privileged		Copy of a draft HD 9	Same
181							Privileged		Copy of a draft HD 80	Same
182							Privileged		Copy of a draft HD 10	Same
183							Privileged		Copy of a draft HD 62	Same
184							Privileged		Copy of a draft HD 8	Same
185							Privileged		Copy of a draft HD 72	Same
186							Privileged		Copy of a draft HD 68	Same
187							Privileged		Copy of a draft HD 49	Same
188							Privileged		Copy of a draft HD 76	Same
189							Privileged		Copy of a draft HD 16	Same
190							Privileged		Copy of a draft HD 69	Same
191							Privileged		Copy of a draft HD 46	Same
192							Privileged		Copy of a draft HD 69	Same

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Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
193							Privileged		Copy of a draft HD 95	Same
194							Privileged		Copy of a draft HD 112	Same
195							Privileged		Copy of a draft HD 65	Same
196							Privileged		Copy of a draft HD 77	Same
197							Privileged		Copy of a draft HD 94	Same
198							Privileged		Copy of a draft HD 123	Same
199							Privileged		Copy of a draft HD 77	Same
200							Privileged		Copy of a draft HD 70	Same
201							Privileged		Copy of a draft HD 70	Same
202							Privileged		Copy of a draft HD 28	Same
203							Privileged		Copy of a draft HD 70	Same
204							Privileged		Copy of a draft HD 50	Same
205							Privileged		Copy of a draft HD 111	Same
206							Privileged		Copy of a draft HD 40	Same
207							Privileged		Copy of a draft HD 93	Same
208							Privileged		Copy of a draft HD 17	Same
209							Privileged		Copy of a draft HD 90	Same
210							Privileged		Copy of a draft HD 19	Same
211							Privileged		Copy of a draft HD 62	Same
212							Privileged		Copy of a draft HD 62	Same
213							Privileged		Copy of a draft HD 91	Same
214							Privileged		Copy of a draft HD 18	Same
215							Privileged		Copy of a draft HD 93	Same
216							Privileged		Copy of a draft HD 55	Same
217							Privileged		Copy of a draft HD 57	Same
218							Privileged		Copy of a draft HD 55	Same
219							Privileged		Copy of a draft HD 04	Same
220							Privileged		Copy of a draft HD 114	Same
221							Privileged		Copy of a draft HD 13	Same
222							Privileged		Copy of a draft HD 57	Same
223							Privileged		Copy of a draft HD 52	Same
224							Privileged		Copy of a draft HD 102	Same
225							Privileged		Copy of a draft HD 37	Same
226							Privileged		Copy of a draft HD 56	Same
227							Privileged		Copy of a draft HD 107	Same
228							Privileged		Copy of a draft HD 102	Same
229							Privileged		Copy of a draft HD 56	Same
230							Privileged		Copy of a draft HD 108	Same
231							Privileged		Copy of a draft HD 108	Same
232							Privileged		Copy of a draft HD 11	Same
233							Privileged		Copy of a draft HD 122	Same
234							Privileged		Copy of a draft HD 42	Same
235							Privileged		Copy of a draft HD 29	Same
236							Privileged		Copy of a draft HD 71	Same
237							Privileged		Copy of a draft HD 84	Same
238							Privileged		Copy of a draft HD 100	Same
239							Privileged		Copy of a draft HD 82	Same

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
240							Privileged		Copy of a draft HD 32	Same
241							Privileged		Copy of a draft HD 29	Same
242							Privileged		Copy of a draft HD 27	Same
243							Privileged		Copy of a draft HD 31	Same
244							Privileged		Copy of a draft HD 104	Same
245							Privileged		Copy of a draft HD 30	Same
246							Privileged		Copy of a draft HD 85	Same
247							Privileged		Copy of a draft HD 34	Same
248							Privileged		Copy of a draft HD 01	Same
249							Privileged		Copy of a draft HD 35	Same
250							Privileged		Copy of a draft HD 33	Same
251							Privileged		Copy of a draft HD 45	Same
252							Privileged		Copy of a draft HD 44	Same
253							Privileged		Copy of a draft HD 36	Same
254							Privileged		Copy of a draft HD 37	Same
255							Privileged		Copy of a draft HD 38	Same
256							Privileged		Copy of a draft HD 14	Same
257							Privileged		Copy of a draft HD 14	Same
258							Privileged		Copy of a draft HD 73	Same
259							Privileged		Copy of a draft HD 66	Same
260							Privileged		Copy of a draft HD 93	Same
261							Privileged		Population data details for a draft HD 12	Same (see objection to Privilege Log No. 158)
262							Privileged		Population data details for a draft HD 60	Same
263							Privileged		Population data details for a draft HD 12	Same
264							Privileged		Population data details for a draft HD 60	Same
265							Privileged		Population data details for a draft HD 63	Same
266							Privileged		Population data details for a draft HD 103	Same
267							Privileged		Population data details for a draft HD 12	Same
268							Privileged		Population data details for a draft HD 78	Same
269							Privileged		Population data details for a draft HD 75	Same
270							Privileged		Population data details for a draft HD 15	Same
271							Privileged		Population data details for a draft HD 118	Same
272							Privileged		Population data details for a draft HD 120	Same
273							Privileged		Population data details for a draft HD 82	Same

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
274							Privileged		Population data details for a draft HD 83	Same
275							Privileged		Population data details for a draft HD 86	Same
276							Privileged		Population data details for a draft HD 117	Same
277							Privileged		Population data details for a draft HD 83	Same
278							Privileged		Population data details for a draft HD 82	Same
279							Privileged		Population data details for a draft HD 95	Same
280							Privileged		Population data details for a draft HD 12 and 13	Same
281							Privileged		Population data details for a draft HD 24	Same
282							Privileged		Population data details for a draft HD 12	Same
283							Privileged		Population data details for a draft HD 96	Same
284							Privileged		Population data details for a draft HD 81	Same
285							Privileged		Population data details for a draft HD 49	Same
286							Privileged		Population data details for a draft HD 102	Same
287							Privileged		Population data details for a draft HD 15	Same
288							Privileged		Population data details for a draft HD 52	Same
289							Privileged		Population data details for a draft HD 93	Same
290							Privileged		Population data details for a draft HD 95	Same
291							Privileged		Population data details for a draft HD 64	Same
292							Privileged		Population data details for a draft HD 51	Same
293							Privileged		Population data details for a draft HD 50	Same
294							Privileged		Population data details for a draft HD 92	Same
295							Privileged		Population data details for a draft HD 57	Same
296							Privileged		Population data details for a draft HD 99	Same

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
297							Privileged		Population data details for a draft HD 90	Same
298							Privileged		Population data details for a draft HD 95	Same
299							Privileged		Population data details for a draft HD 57	Same
300							Privileged		Population data details for a draft HD 55	Same
301							Privileged		Population data details for a draft HD 101	Same
302							Privileged		Population data details for a draft HD 37	Same
303							Privileged		Population data details for a draft HD 38	Same
304							Privileged		Population data details for a draft HD 70	Same
305							Privileged		Population data details for a draft HD 75	Same
306							Privileged		Population data details for a draft HD 78	Same
307							Privileged		Population data details for a draft HD 123	Same
308							Privileged		Population data details for a draft HD 57	Same
309							Privileged		Population data details for a draft HD 117	Same
310							Privileged		Population data details for a draft HD 55	Same
311							Privileged		Population data details for a draft HD 101	Same
312							Privileged		Population data details for a draft HD 86	Same
313							Privileged		Population data details for a draft HD 101	Same
314							Privileged		Population data details for a draft HD 86	Same
315							Privileged		Population data details for a draft HD 67	Same
316							Privileged		Population data details for a draft HD 25	Same
317							Privileged		Population data details for a draft HD 23	Same
318							Privileged		Population data details for a draft HD 25	Same
319							Privileged		Population data details for a draft HD 19	Same

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
320							Privileged		Population data details for a draft HD 17	Same
321							Privileged		Population data details for a draft HD 23	Same
322							Privileged		Population data details for a draft HD 24	Same
323							Privileged		Population data details for a draft HD 25	Same
324							Privileged		Population data details for a draft HD 35	Same
325							Privileged		Population data details for a draft HD 27	Same
326							Privileged		Population data details for a draft HD 16	Same
327							Privileged		Population data details for a draft HD 28	Same
328							Privileged		Population data details for a draft HD 16	Same
329							Privileged		Population data details for a draft HD 28	Same
330							Privileged		Population data details for a draft HD 58	Same
331							Privileged		Population data details for a draft HD 105	Same
332							Privileged		Population data details for a draft HD 104	Same
333							Privileged		Population data details for a draft HD 56	Same
334							Privileged		Population data details for a draft HD 113	Same
335							Privileged		Population data details for a draft HD 91	Same
336							Privileged		Population data details for a draft HD 113	Same
337							Privileged		Population data details for a draft HD 121	Same
338							Privileged		Population data details for a draft HD 79	Same
339							Privileged		Population data details for a draft HD 51	Same
340							Privileged		Population data details for a draft HD 79	Same
341							Privileged		Population data details for a draft HD 87	Same
342							Privileged		Population data details for a draft HD 97	Same

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
343							Privileged		Population data details for a draft HD 42	Same
344							Privileged		Population data details for a draft HD 92	Same
345							Privileged		Population data details for a draft HD 54	Same
346							Privileged		Population data details for a draft HD 57	Same
347							Privileged		Population data details for a draft HD 109	Same
348							Privileged		Population data details for a draft HD 70	Same
349							Privileged		Population data details for a draft HD 109	Same
350							Privileged		Population data details for a draft HD 79	Same
351							Privileged		Population data details for a draft HD 109	Same
352							Privileged		Population data details for a draft HD 38	Same
353							Privileged		Population data details for a draft HD 53	Same
354							Privileged		Population data details for a draft HD 45	Same
355							Privileged		Population data details for a draft HD 39	Same
356							Privileged		Population data details for a draft HD 110	Same
357							Privileged		Population data details for a draft HD 91	Same
358							Privileged		Population data details for a draft HD 82	Same
359							Privileged		Population data details for a draft HD 124	Same
360							Privileged		Population data details for a draft HD 107	Same
361							Privileged		Population data details for a draft HD 35	Same
362							Privileged		Population data details for a draft HD 106	Same
363							Privileged		Population data details for a draft HD 34	Same
364							Privileged		Population data details for a draft HD 105	Same
365							Privileged		Population data details for a draft HD 61	Same

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
366							Privileged		Population data details for a draft HD 21	Same
367							Privileged		Population data details for a draft HD 58	Same
368							Privileged		Population data details for a draft HD 26	Same
369							Privileged		Population data details for a draft HD 27	Same
370							Privileged		Population data details for a draft HD 70	Same
371							Privileged		Population data details for a draft HD 25	Same
372							Privileged		Population data details for a draft HD 29	Same
373							Privileged		Population data details for a draft HD 25	Same
374							Privileged		Population data details for a draft HD 47	Same
375							Privileged		Population data details for a draft HD 25	Same
376							Privileged		Population data details for a draft HD 46	Same
377							Privileged		Population data details for a draft HD 89	Same
378							Privileged		Population data details for a draft HD 13	Same
379							Privileged		Population data details for a draft HD 55	Same
380							Privileged		Population data details for a draft HD 57	Same
381							Privileged		Population data details for a draft HD 49	Same
382							Privileged		Population data details for a draft HD 52	Same
383							Privileged		Population data details for a draft HD 37	Same
384							Privileged		Population data details for a draft HD 102	Same
385							Privileged		Population data details for a draft HD 56	Same
386							Privileged		Population data details for a draft HD 107	Same
387							Privileged		Population data details for a draft HD 72	Same
388							Privileged		Population data details for a draft HD 56	Same

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
389							Privileged		Population data details for a draft HD 68	Same
390							Privileged		Population data details for a draft HD 102	Same
391							Privileged		Population data details for a draft HD 69	Same
392							Privileged		Population data details for a draft HD 76	Same
393							Privileged		Population data details for a draft HD 16	Same
394							Privileged		Population data details for a draft HD 69	Same
395							Privileged		Population data details for a draft HD 46	Same
396							Privileged		Population data details for a draft HD 112	Same
397							Privileged		Population data details for a draft HD 95	Same
398							Privileged		Population data details for a draft HD 77	Same
399							Privileged		Population data details for a draft HD 65	Same
400							Privileged		Population data details for a draft HD 94	Same
401							Privileged		Population data details for a draft HD 77	Same
402							Privileged		Population data details for a draft HD 123	Same
403							Privileged		Population data details for a draft HD 70	Same
404							Privileged		Population data details for a draft HD 28	Same
405							Privileged		Population data details for a draft HD 70	Same
406							Privileged		Population data details for a draft HD 85	Same
407							Privileged		Population data details for a draft HD 40	Same
408							Privileged		Population data details for a draft HD 70	Same
409							Privileged		Population data details for a draft HD 50	Same
410							Privileged		Population data details for a draft HD 93	Same
411							Privileged		Population data details for a draft HD 17	Same

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
412							Privileged		Population data details for a draft HD 111	Same
413							Privileged		Population data details for a draft HD 19	Same
414							Privileged		Population data details for a draft HD 90	Same
415							Privileged		Population data details for a draft HD 61	Same
416							Privileged		Population data details for a draft HD 43	Same
417							Privileged		Population data details for a draft HD 59	Same
418							Privileged		Population data details for a draft HD 03	Same
419							Privileged		Population data details for a draft HD 102	Same
420							Privileged		Population data details for a draft HD 32	Same
421							Privileged		Population data details for a draft HD 84	Same
422							Privileged		Population data details for a draft HD 49	Same
423							Privileged		Population data details for a draft HD 08	Same
424							Privileged		Population data details for a draft HD 10	Same
425							Privileged		Population data details for a draft HD 41	Same
426							Privileged		Population data details for a draft HD 77	Same
427							Privileged		Population data details for a draft HD 48	Same
428							Privileged		Population data details for a draft HD 69	Same
429							Privileged		Population data details for a draft HD 85	Same
430							Privileged		Population data details for a draft HD 40	Same
431							Privileged		Population data details for a draft HD 110	Same
432							Privileged		Population data details for a draft HD 33	Same
433							Privileged		Population data details for a draft HD 92	Same
434							Privileged		Population data details for a draft HD 110	Same

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
435							Privileged		Population data details for a draft HD 87	Same
436							Privileged		Population data details for a draft HD 42	Same
437							Privileged		Population data details for a draft HD 49	Same
438							Privileged		Population data details for a draft HD 86	Same
439							Privileged		Population data details for a draft HD 26	Same
440							Privileged		Population data details for a draft HD 84	Same
441							Privileged		Population data details for a draft HD 83	Same
442							Privileged		Population data details for a draft HD 41	Same
443							Privileged		Population data details for a draft HD 82	Same
444							Privileged		Population data details for a draft HD 81	Same
445							Privileged		Population data details for a draft HD 80	Same
446							Privileged		Population data details for a draft HD 06	Same
447							Privileged		Population data details for a draft HD 09	Same
448							Privileged		Population data details for a draft HD 40	Same
449							Privileged		Population data details for a draft HD 116	Same
450							Privileged		Population data details for a draft HD 10	Same
451							Privileged		Population data details for a draft HD 54	Same
452							Privileged		Population data details for a draft HD 55	Same
453							Privileged		Population data details for a draft HD 82	Same
454							Privileged		Population data details for a draft HD 27	Same
455							Privileged		Population data details for a draft HD 35	Same
456							Privileged		Population data details for a draft HD 85	Same
457							Privileged		Population data details for a draft HD 30	Same

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
458							Privileged		Population data details for a draft HD 33	Same
459							Privileged		Population data details for a draft HD 104	Same
460							Privileged		Population data details for a draft HD 36	Same
461							Privileged		Population data details for a draft HD 01	Same
462							Privileged		Population data details for a draft HD 37	Same
463							Privileged		Population data details for a draft HD 44	Same
464							Privileged		Population data details for a draft HD 38	Same
465							Privileged		Population data details for a draft HD 45	Same
466							Privileged		Population data details for a draft HD 73	Same
467							Privileged		Population data details for a draft HD 14	Same
468							Privileged		Population data details for a draft HD 93	Same
469							Privileged		Population data details for a draft HD 04	Same
470							Privileged		Population data details for a draft HD 66	Same
471							Privileged		Population data details for a draft HD 114	Same
472							Privileged		Population data details for a draft HD 55	Same
473							Privileged		Population data details for a draft HD 57	Same
474							Privileged		Population data details for a draft HD 41	Same
475							Privileged		Population data details for a draft HD 07	Same
476							Privileged		Population data details for a draft HD 62	Same
477							Privileged		Population data details for a draft HD 08	Same
478							Privileged		Population data details for a draft HD 62	Same
479							Privileged		Population data details for a draft HD 18	Same
480							Privileged		Population data details for a draft HD 91	Same

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
481							Privileged		Population data details for a draft HD 122	Same
482							Privileged		Population data details for a draft HD 11	Same
483							Privileged		Population data details for a draft HD 104	Same
484							Privileged		Population data details for a draft HD 29	Same
485							Privileged		Population data details for a draft HD 108	Same
486							Privileged		Population data details for a draft HD 42	Same
487							Privileged		Population data details for a draft HD 108	Same
488							Privileged		Population data details for a draft HD 71	Same
489							Privileged		Population data details for a draft HD 84	Same
490							Privileged		Population data details for a draft HD 100	Same
491							Privileged		Population data details for a draft HD 82	Same
492							Privileged		Population data details for a draft HD 32	Same
493							Privileged		Population data details for a draft HD 29	Same
494							Privileged		Population data details for a draft HD 31	Same
495							Privileged		Population data details for a draft HD 34	Same
496	Chris Murphy	Emma Dean; Jimmy Hinson			Chairmans Retreat 1/4-1/5	12/20/21		Attorney-Client Communication	Confidential communication to staff counsel regarding topics for meeting.	Not AC because communication to staff regarding the "topics" for the "chairmans retreat" is not legal advice.
497	Ashley Harwell-Beach	Emma Dean			Redistricting	11/8/21		Work Product	Communication between staff counsel regarding internal process planning.	Not a WPP because the document does not appear to be for the purpose of litigation; legislative counsel cannot "withhold documents pertaining to pending legislation" (Bethune-Hill, 144 F. Supp. 3d at 348); document was created in the "ordinary course" of legislation. (Id.); a communication is not AWP.

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
498	Carl Anderson	Emma Dean			RE: FW: Redistricting	11/12/21	Privileged		Communication from legislator to staff counsel regarding draft map.	Document/communication constitutes "All versions of maps and related documents produced during the course of the development, design, and/or revisions of H. 4493" and, pursuant to the Court's Order (ECF No. 153) must be produced. This communicaiton may also reveal Defendants' "intent behind any proposed design and/or revision of the H. 4493 or any individual district referenced in Plaintiffs' Amended Complaint." Also, "staff counsel" is not an immediate aide that enjoys the legislative privilege (<i>Bethune-Hill v. Va. State Bd. of Elections</i> , 144 F. Supp. 2d 323, 343 (E.D. Va. 2015); because the email is about "draft map," email may contain "strictly factual information" and/or non-privileged information that were relied upon by legislators (<i>Id.</i> (citing <i>Comm. for Fair and Balanced Maps v. Ill. State Bd. of Elections</i> , 2011 WL 4837508, at *9 (N.D. Ill. Oct. 12, 2011)); document may "'reveal[] an awareness' of: racial considerations employed in the districting process, sorting of voters according to race, or the impact of redistricting upon the ability of minority voters to elect a candidate of choice" (<i>Id.</i> at 344); document could "reflect a violation of the Equal Protection Clause of the Fourteenth Amendment" (<i>City of Greensboro v. Guilford Cnty. Bd. of Elections</i> , 2016 WL 11660626, at *5 (M.D.N.C. Dec. 20, 2016).
499	Emma Dean	Chris Murphy			Attorney Communication Privileged	9/3/21		Attorney-Client Communication; Work Product	Communication to legislator with draft work product for review.	Not ACC because the communication is for "review," not obtaining legal advice. Not a WPP because the document does not appear to be for the purpose of litigation; legislative counsel cannot "withhold documents pertaining to pending legislation" (<i>Bethune-Hill</i> , 144 F. Supp. 3d at 348); document was created in the "ordinary course" of legislation. (<i>Id.</i>); a communication is not AWP.
500					Draft Letter from Ch. Murphy 9.3.21.docx	9/3/21		Attorney-Client Communication; Work Product	Attachment to communication to legislator with draft work product for review.	Same

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
501	Linda Anderson	Emma Dean			FW: Rep. Anderson	9/13/21	Privileged		Communication on behalf of legislator to staff counsel regarding map planning.	Document/communication constitutes "All versions of maps and related documents produced during the course of the development, design, and/or revisions of H. 4493" and, pursuant to the Court's Order (ECF No. 153) must be produced. This communicaiton may also reveal Defendants' "intent behind any proposed design and/or revision of the H. 4493 or any individual district referenced in Plaintiffs' Amended Complaint." "Staff counsel" is not an immediate aide that enjoys the legislative privilege (<i>Bethune-Hill v. Va. State Bd. of Elections</i> , 144 F. Supp. 2d 323, 343 (E.D. Va. 2015); because the email is about "map planning," email may contain "strictly factual information" and/or non-privileged information that were relied upon by legislators (<i>Id.</i> (citing <i>Comm. for Fair and Balanced Maps v. Ill. State Bd. of Elections</i> , 2011 WL 4837508, at *9 (N.D. Ill. Oct. 12, 2011)); document may "'reveal[] an awareness' of: racial considerations employed in the districting process, sorting of voters according to race, or the impact of redistricting upon the ability of minority voters to elect a candidate of choice" (<i>Id.</i> at 344); document could "reflect a violation of the Equal Protection Clause of the Fourteenth Amendment" (<i>City of Greensboro v. Guilford Cnty. Bd. of Elections</i> , 2016 WL 11660626, at *5 (M.D.N.C. Dec. 20, 2016).
502	Emma Dean	Jay Jordan			FW: "REDACTED"	9/28/21		Attorney-Client Communication	Communication from staff counsel to legislator forwarding legal advice.	Lacks sufficient information to make a privilege determination. Defendant "bears the burden to show that the 'work product' was prepared in anticipation of litigation." (RLI Ins. Co. v. Conseco, Inc., 477 F. Supp. 3d 741, 749 (E.D. Va. 2007).
503					Notes for "REDACTED"	9/28/21		Attorney-Client Communication; Work Product	Work product legal advice from outside counsel.	Same

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
504	Robin Heatwole	Emma Dean	Kim Johnson		District 64 Map	11/2/21	Privileged		Communication on behalf of legislator to staff counsel regarding draft map.	<p>Document/communication constitutes "All versions of maps and related documents produced during the course of the development, design, and/or revisions of H. 4493" and, pursuant to the Court's Order (ECF No. 153) must be produced. This communicaiton may also reveal Defendants' "intent behind any proposed design and/or revision of the H. 4493 or any individual district referenced in Plaintiffs' Amended Complaint."</p> <p>Also, "staff counsel" is not an immediate aide that enjoys the legislative privilege (<i>Bethune-Hill v. Va. State Bd. of Elections</i> , 144 F. Supp. 2d 323, 343 (E.D. Va. 2015); because the email is about "draft map," email may contain "strictly factual information" and/or non-privileged information that were relied upon by legislators (<i>Id.</i> (citing <i>Comm. for Fair and Balanced Maps v. Ill. State Bd. of Elections</i> , 2011 WL 4837508, at *9 (N.D. Ill. Oct. 12, 2011)); document may "'reveal[] an awareness' of: racial considerations employed in the districting process, sorting of voters according to race, or the impact of redistricting upon the ability of minority voters to elect a candidate of choice" (<i>Id.</i> at 344); document could "reflect a violation of the Equal Protection Clause of the Fourteenth Amendment" (<i>City of Greensboro v. Guilford Cnty. Bd. of Elections</i> , 2016 WL 11660626, at *5 (M.D.N.C. Dec. 20, 2016).</p>
505	Emma Dean	Jimmy Hinson			Fwd: S.865 - ACT for our review	1/26/22		Work Product	Communication between staff counsel regarding process planning for legislation.	Not WPP because "process planning" is not legal advice. The document does not appear to be for the purpose of litigation; legislative counsel cannot "withhold documents pertaining to pending legislation" (<i>Bethune-Hill</i> , 144 F. Supp. 3d at 348); document was created in the "ordinary course" of legislation. (<i>Id.</i>); a communication is not AWP.
506					865AHB22.pdf	1/26/22		Work Product	Attachment to communication between staff counsel regarding legislative drafting.	Same
507	Neal Collins	Emma Dean			Re: August 3rd meeting notice	7/23/21	Privileged		Communication from legislator to staff counsel regarding planning.	<p>Lacks sufficient information to make a privilege determination, but "staff counsel" is not an immediate aide that enjoys the legislative privilege (<i>Bethune-Hill v. Va. State Bd. of Elections</i> , 144 F. Supp. 2d 323, 343 (E.D. Va. 2015); because the email is about "planning," email may contain "strictly factual information" and/or non-privileged information that were relied upon by legislators (<i>Id.</i> (citing <i>Comm. for Fair and Balanced Maps v. Ill. State Bd. of Elections</i> , 2011 WL 4837508, at *9 (N.D. Ill. Oct. 12, 2011)); document may "'reveal[] an awareness' of: racial considerations employed in the districting process, sorting of voters according to race, or the impact of redistricting upon the ability of minority voters to elect a candidate of choice" (<i>Id.</i> at 344); document could "reflect a violation of the Equal Protection Clause of the Fourteenth Amendment" (<i>City of Greensboro v. Guilford Cnty. Bd. of Elections</i> , 2016 WL 11660626, at *5 (M.D.N.C. Dec. 20, 2016).</p>

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
508	Elizabeth Taylor	Emma Dean; Jimmy Hinson			Rep. McCravy	1/13/22	Privileged		Communication on behalf of legislator to staff counsel regarding draft map.	<p>Document/communication constitutes "All versions of maps and related documents produced during the course of the development, design, and/or revisions of H. 4493" and, pursuant to the Court's Order (ECF No. 153) must be produced. This communicaiton may also reveal Defendants' "intent behind any proposed design and/or revision of the H. 4493 or any individual district referenced in Plaintiffs' Amended Complaint."</p> <p>Also, "staff counsel" is not an immediate aide that enjoys the legislative privilege (<i>Bethune-Hill v. Va. State Bd. of Elections</i> , 144 F. Supp. 2d 323, 343 (E.D. Va. 2015); because the email is about "draft map," email may contain "strictly factual information" and/or non-privileged information that were relied upon by legislators (<i>Id.</i> (citing <i>Comm. for Fair and Balanced Maps v. Ill. State Bd. of Elections</i> , 2011 WL 4837508, at *9 (N.D. Ill. Oct. 12, 2011)); document may "'reveal[] an awareness' of: racial considerations employed in the districting process, sorting of voters according to race, or the impact of redistricting upon the ability of minority voters to elect a candidate of choice" (<i>Id.</i> at 344); document could "reflect a violation of the Equal Protection Clause of the Fourteenth Amendment" (<i>City of Greensboro v. Guilford Cnty. Bd. of Elections</i> , 2016 WL 11660626, at *5 (M.D.N.C. Dec. 20, 2016).</p>
509	Emma Dean	Ashley Harwell-Beach			Draft amendment	1/11/22		Work Product	Communication between staff counsel regarding legislative drafting.	Not a WPP because the document does not appear to be for the purpose of litigation but rather draft legislation; legislative counsel cannot "withhold documents pertaining to pending legislation" (<i>See e.g.</i> , <i>Bethune-Hill</i> , 144 F. Supp. 3d at 348); document was created in the "ordinary course" of legislation. (<i>Id.</i>).
510					Document1.docx	1/11/22		Work Product	Attachment to communication between staff counsel regarding legislative drafting.	Same
511	Emma Dean	Paula Benson			language for bill	1/12/22		Work Product	Communication between staff counsel regarding legislative drafting.	Same
512					Document1.docx	1/12/22		Work Product	Attachment to communication from staff counsel regarding legislative drafting.	Same
513	Emma Dean	Jimmy Hinson			Fwd: S.865 - ACT for our review	1/26/22		Work Product	Communication between staff counsel regarding legislative drafting.	Same
514					865AHB22.pdf	1/26/22		Work Product	Attachment to communication between staff counsel regarding legislative drafting.	Same
515	Emma Dean	Ashley Harwell-Beach			Amendment	12/1/21		Work Product	Communication between staff counsel regarding legislative drafting.	Same

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
516					12.1 Draft Language.docx	12/1/21		Attorney-Client Communication	Attachment to communication between staff counsel regarding legislative drafting.	Not ACC because communication was not with a "client" but "between staff;" "legislative drafting" is not "legal advice." Legislative counsel cannot "withhold documents pertaining to pending legislation" (<i>See e.g.</i> , <i>Bethune-Hill</i> , 144 F. Supp. 3d at 348).
517	Emma Dean	Ashley Harwell-Beach			Compare Result 5	12/8/21		Work Product	Communication between staff counsel regarding legislative drafting.	Document/communication appears to relate to the "intent behind any proposed design and/or revision of the H. 4493 or any individual district referenced in Plaintiffs’ Amended Complaint" or else may be related to "racially polarized voting analysis utilized in the development, design and/or revision of H. 4493" and thus must be produced pursuant to the Court's Order. Not a WPP because the document does not appear to be for the purpose of litigation but rather draft legislation; legislative counsel cannot "withhold documents pertaining to pending legislation" (<i>See e.g.</i> , <i>Bethune-Hill</i> , 144 F. Supp. 3d at 348); document was created in the "ordinary course" of legislation. (<i>Id.</i>).
518					Compare Result 5.docx	12/8/21		Work Product	Attachment to communication between staff counsel regarding legislative drafting.	Same
519	Emma Dean	Ashley Harwell-Beach			Re: Redistricting Act	12/8/21		Work Product	Communication between staff counsel regarding legislative drafting.	Same
520					4493AHB21.pdf	12/8/21		Work Product	Attachment to communication between staff counsel regarding legislative drafting.	Same
521	Jason Elliott	Emma Dean			Re: District 31	11/12/21	Privileged		Communication from legislator to staff counsel regarding draft map.	Document/communication constitutes "All versions of maps and related documents produced during the course of the development, design, and/or revisions of H. 4493" and, pursuant to the Court's Order (ECF No. 153) must be produced. This communicaiton may also reveal Defendants' "intent behind any proposed design and/or revision of the H. 4493 or any individual district referenced in Plaintiffs’ Amended Complaint." Also, "staff counsel" is not an immediate aide that enjoys the legislative privilege (<i>Bethune-Hill v. Va. State Bd. of Elections</i> , 144 F. Supp. 2d 323, 343 (E.D. Va. 2015); because the email is about "draft map," for District 31 email may contain "strictly factual information" and/or non-privileged information that were relied upon by legislators (<i>Id.</i> (citing <i>Comm. for Fair and Balanced Maps v. Ill. State Bd. of Elections</i> , 2011 WL 4837508, at *9 (N.D. Ill. Oct. 12, 2011)); document may "'reveal[] an awareness' of: racial considerations employed in the districting process, sorting of voters according to race, or the impact of redistricting upon the ability of minority voters to elect a candidate of choice" (<i>Id.</i> at 344); document could "reflect a violation of the Equal Protection Clause of the Fourteenth Amendment" (<i>City of Greensboro v. Guilford Cnty. Bd. of Elections</i> , 2016 WL 11660626, at *5 (M.D.N.C. Dec. 20, 2016).

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Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
522					HD-031.pdf	11/12/21	Privileged		Attachment to communication from legislator to staff counsel regarding draft map.	Same
523	Beth Bernstein	Emma Dean; Patricia Henegan; Justin Bamberg; Wallace Jordan; Weston Newton	Jimmy Hinson; Roland Franklin; Linda Anderson; Neal Collins; Jason Elliot		Redistricting	11/15/21		Attorney-Client Communication	Communication from legislator to staff counsel requesting legal input.	Description does not have sufficient information to make a privilege determination.
524	copier@scstatehouse.gov	Emma Dean			Scanned image from MX-6070N	10/1/21		Work Product	Scan transmission for staff counsel file.	Lacks sufficient information to make a privilege determination. Defendant "bears the burden to show that the 'work product' was prepared in anticipation of litigation." (<i>RLI Ins. Co. v. Conseco, Inc.</i> , 477 F. Supp. 3d 741, 749 (E.D. Va. 2007)).
525					BL302Copier_20211001_143826.pdf	10/1/21		Work Product	Scan for staff counsel file.	Same
526	copier@scstatehouse.gov	Emma Dean			Scanned image from MX-6070N	10/1/21		Work Product	Scan transmission for staff counsel file.	Same
527					BL302Copier_20211001_162239.pdf	10/1/21		Work Product	Scan for staff counsel file.	Same
528	Linda Anderson	Emma Dean			Map room	11/2/21	Privileged		Communication on behalf of legislator to staff counsel regarding map planning.	<p>Document/communication constitutes "All versions of maps and related documents produced during the course of the development, design, and/or revisions of H. 4493" and, pursuant to the Court's Order (ECF No. 153) must be produced. This communicaiton may also reveal Defendants' "intent behind any proposed design and/or revision of the H. 4493 or any individual district referenced in Plaintiffs' Amended Complaint."</p> <p>"Staff counsel" is not an immediate aide that enjoys the legislative privilege (<i>Bethune-Hill v. Va. State Bd. of Elections</i> , 144 F. Supp. 2d 323, 343 (E.D. Va. 2015); defendant's description of communication is insufficient but because the email is about "map planning," it likely contains "strictly factual information" and/or non-privileged information that were relied upon by legislators (<i>Id.</i> (citing <i>Comm. for Fair and Balanced Maps v. Ill. State Bd. of Elections</i> , 2011 WL 4837508, at *9 (N.D. Ill. Oct. 12, 2011)); document may "reveal[] an awareness' of: racial considerations employed in the districting process, sorting of voters according to race, or the impact of redistricting upon the ability of minority voters to elect a candidate of choice" (<i>Id.</i> at 344); document could "reflect a violation of the Equal Protection Clause of the Fourteenth Amendment" (<i>City of Greensboro v. Guilford Cnty. Bd. of Elections</i> , 2016 WL 11660626, at *5 (M.D.N.C. Dec. 20, 2016)).</p>

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
529	Elizabeth Taylor	Vic Dabney	Emma Dean; Jimmy Hinson		RE: Amendment to the Redistricting Plan.	11/18/21	Privileged	Attorney-Client Communication	Communication from legislator to staff counsel regarding draft map and legislative process.	<p>Document/communication constitutes "All versions of maps and related documents produced during the course of the development, design, and/or revisions of H. 4493" and, pursuant to the Court's Order (ECF No. 153) must be produced. This communicaiton may also reveal Defendants' "intent behind any proposed design and/or revision of the H. 4493 or any individual district referenced in Plaintiffs' Amended Complaint."</p> <p>Staff counsel is not an immediate aide that enjoys the legislative privilege (Bethune-Hill v. Va. State Bd. of Elections, 144 F. Supp. 2d 323, 343 (E.D. Va. 2015); because the email is about an "amendment to the redistricting plan" it likely contains "strictly factual information" and/or non-privileged information that were relied upon by legislators (Id. (citing Comm. for Fair and Balanced Maps v. Ill. State Bd. of Elections, 2011 WL 4837508, at *9 (N.D. Ill. Oct. 12, 2011)); document may "'reveal[] an awareness' of: racial considerations employed in the districting process, sorting of voters according to race, or the impact of redistricting upon the ability of minority voters to elect a candidate of choice" (Id. at 344); document could "reflect a violation of the Equal Protection Clause of the Fourteenth Amendment" (City of Greensboro v. Guilford Cnty. Bd. of Elections, 2016 WL 11660626, at *5 (M.D.N.C. Dec. 20, 2016). Not protected by AC because communication among staff does not appear to be for the purpose of legal advice but legislation</p>
530	Mark Smith	Emma Dean	Patrick Dennis		Re: Letter from Chairman Murphy	11/29/21	Privileged	Attorney-Client Communication	Communication from legislator to staff counsel regarding draft map and legislative process.	Same.

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
531	Thomas Hauger	Ashley Harwell-Beach	Emma Dean		RE: Redistricting "REDACTED"	11/29/21	Privileged	Work Product	Communication among legislative staff and staff counsel regarding process planning for legislation.	<p>Document/communication constitutes "All versions of maps and related documents produced during the course of the development, design, and/or revisions of H. 4493" and, pursuant to the Court's Order (ECF No. 153) must be produced. This communicaiton may also reveal Defendants' "intent behind any proposed design and/or revision of the H. 4493 or any individual district referenced in Plaintiffs' Amended Complaint."</p> <p>Also, document should be produced because it may "'reveal[] an awareness' of: racial considerations employed in the districting process, sorting of voters according to race, or the impact of redistricting upon the ability of minority voters to elect a candidate of choice" (<i>Bethune-Hill v. Va. State Bd. of Elections</i> , 144 F. Supp. 2d 323, 344 (E.D. Va. 2015); document could "reflect a violation of the Equal Protection Clause of the Fourteenth Amendment" (<i>City of Greensboro v. Guilford Cnty. Bd. of Elections</i> , 2016 WL 11660626, at *5 (M.D.N.C. Dec. 20, 2016).</p> <p>Not protected by AC/WPP because communication among staff is not legal advice; legislative counsel cannot "withhold documents pertaining to pending legislation" (<i>Bethune-Hill</i> , 144 F. Supp. 3d at 348); document was created in the "ordinary course" of legislation. (<i>Id.</i>).</p>
532	Ashley Harwell-Beach	Thomas Hauger	Emma Dean		RE: Redistricting "REDACTED"	11/29/21	Privileged	Work Product	Communication among legislative staff and staff counsel regarding process planning for legislation.	Same
533	Thomas Hauger	Ashley Harwell-Beach; Patrick Dennis; Emma Dean			RE: Update to "REDACTED"	12/5/21	Privileged	Work Product	Communication among legislative staff and staff counsel regarding process planning for legislation.	Same
534	Ashley Harwell-Beach	Thomas Hauger; Patrick Dennis; Emma Dean			RE: Update to "REDACTED"	12/5/21	Privileged	Work Product	Communication among legislative staff and staff counsel regarding process planning for legislation.	Same
535	Thomas Hauger	Ashley Harwell-Beach; Patrick Dennis; Emma Dean			RE: Update to "REDACTED"	12/6/21	Privileged	Work Product	Communication among legislative staff and staff counsel regarding process planning for legislation.	Same

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
536	Ashley Harwell-Beach	Thomas Hauger; Patrick Dennis; Emma Dean			RE: Update to "REDACTED"	12/6/21	Privileged	Attorney-Client Communication	Communication among legislative staff and staff counsel regarding process planning for legislation.	<p>Document/communication constitutes "All versions of maps and related documents produced during the course of the development, design, and/or revisions of H. 4493" and, pursuant to the Court's Order (ECF No. 153) must be produced. This communicaiton may also reveal Defendants' "intent behind any proposed design and/or revision of the H. 4493 or any individual district referenced in Plaintiffs' Amended Complaint."</p> <p>Also, document may "'reveal[] an awareness' of: racial considerations employed in the districting process, sorting of voters according to race, or the impact of redistricting upon the ability of minority voters to elect a candidate of choice" (<i>Bethune-Hill v. Va. State Bd. of Elections</i> , 144 F. Supp. 2d 323, 344 (E.D. Va. 2015)); document could "reflect a violation of the Equal Protection Clause of the Fourteenth Amendment" (<i>City of Greensboro v. Guilford Cnty. Bd. of Elections</i>, 2016 WL 11660626, at *5 (M.D.N.C. Dec. 20, 2016).</p> <p>Not protected by AC because communication among staff does not appear to be for the purpose of legal advice but legislation.</p>
537	Chris Murphy	Emma Dean	Patrick Dennis; Jay Jordan		Re: 7.21.21 Draft letter	7/20/21	Privileged	Attorney-Client Communication	Communication between legislator and staff counsel regarding planning process.	Same
538	Roger Kirby	Wallace Jordan; Patrick Dennis; James H. "Jay" Lucas			Redistricting - KIRBY	11/15/21	Privileged		Communication from legislator to legislators and staff counsel regarding draft map.	<p>Document/communication constitutes "All versions of maps and related documents produced during the course of the development, design, and/or revisions of H. 4493" and, pursuant to the Court's Order (ECF No. 153) must be produced. This communicaiton may also reveal Defendants' "intent behind any proposed design and/or revision of the H. 4493 or any individual district referenced in Plaintiffs' Amended Complaint."</p> <p>Document may "'reveal[] an awareness' of: racial considerations employed in the districting process, sorting of voters according to race, or the impact of redistricting upon the ability of minority voters to elect a candidate of choice" and thus should be produced (<i>Bethune-Hill v. Va. State Bd. of Elections</i>, 144 F. Supp. 2d 323, 344 (E.D. Va. 2015)); document could "reflect a violation of the Equal Protection Clause of the Fourteenth Amendment" (<i>City of Greensboro v. Guilford Cnty. Bd. of Elections</i>, 2016 WL 11660626, at *5 (M.D.N.C. Dec. 20, 2016)</p>

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
539	Haley Mottel	Gary Simrill	Patrick Dennis; Nicolette Walters		Fwd: Final Draft :)	1/4/22	Privileged	Attorney-Client Communication; Work Product	Communication to legislator with draft work product for review.	<p>Document/communication constitutes "All versions of maps and related documents produced during the course of the development, design, and/or revisions of H. 4493" and, pursuant to the Court's Order (ECF No. 153) must be produced. This communicaiton may also reveal Defendants' "intent behind any proposed design and/or revision of the H. 4493 or any individual district referenced in Plaintiffs' Amended Complaint."</p> <p>Document may "'reveal[] an awareness' of: racial considerations employed in the districting process, sorting of voters according to race, or the impact of redistricting upon the ability of minority voters to elect a candidate of choice" (<i>Bethune-Hill v. Va. State Bd. of Elections</i> , 144 F. Supp. 2d 323, 344 (E.D. Va. 2015); document could "reflect a violation of the Equal Protection Clause of the Fourteenth Amendment" (<i>City of Greensboro v. Guilford Cnty. Bd. of Elections</i> , 2016 WL 11660626, at *5 (M.D.N.C. Dec. 20, 2016).</p> <p>Not protected by the AC/WPP because the communication does not appear to be for the purpose of legal advice; legislative counsel cannot "withhold documents pertaining to pending legislation" (<i>Bethune-Hill</i>, 144 F. Supp. 3d at 348); document was created in the "ordinary course" of legislation. (Id.).</p>
540					2022 First Monday Draft.1.2.22.docx	1/4/22	Privileged	Work Product	Communication to legislator with draft work product for review.	<p>Insufficient information provided but document likely not protected by the AC/WPP because the communication does not appear to be for the purpose of legal advice; legislative counsel cannot "withhold documents pertaining to pending legislation" (<i>Bethune-Hill</i> , 144 F. Supp. 3d at 348); document was created in the "ordinary course" of legislation. (Id.).</p> <p>If document/communication includes draft map, must be produced pursuant to the Court's Order. (ECF No. 153).</p>
541	Charles Reid	Patrick Dennis			Reid Affidavit Final.DOCX	1/18/22		Attorney-Client Communication; Work Product	Communication between staff counsel regarding litigation	Defendants have not not provided sufficient information to make a privilege determination, but does apear to be for the purpose of legal advice and thus protected as ACC/WP.
542					Reid Affidavit Final.DOCX	1/18/22		Attorney-Client Communication; Work Product	Attachment to communication between staff counsel regarding litigation	Same
543	Patrick Dennis	Nicolette Walters			Re: DRAFT: First Monday 2022 remarks	12/24/21		Attorney-Client Communication; Work Product	Communication between staff counsel and legislative staff with draft work product for review.	Document not protected by the AC/WPP because the communication does not appear to be for the purpose of legal advice; legislative counsel cannot "withhold documents pertaining to pending legislation" (<i>Bethune-Hill</i> , 144 F. Supp. 3d at 348); document was created in the "ordinary course" of legislation. (Id.); "remarks" are not legal advice.
544					22.01.03 First Monday speech.docx	12/24/21		Work Product	Attachment to communication between staff counsel and legislative staff with draft work product for review.	See above.

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
545	Patrick Dennis	Haley Mottel; Nicolette Walters; Jay Lucas			Redistricting portion for Monday Speech DRAFT	12/29/21	Privileged	Attorney-Client Communication; Work Product	Communication between staff counsel, legislator and legislative staff with draft work product for review.	Document/communication appears to relate to "intent behind any proposed design and/or revision of the H. 4493 or any individual district referenced in Plaintiffs' Amended Complaint" and thus must be produced pursuant to the Court's Order. Communication between staff counsel is not a communication between legislators and between legislators and immediate staff (<i>Bethune-Hill v. Va. State Bd. of Elections</i> , 144 F. Supp. 2d 323, 343 (E.D. Va. 2015); email could contain "strictly factual information" and/or non-privileged information that were relied upon by legislators (<i>Id.</i> (citing <i>Comm. for Fair and Balanced Maps v. Ill. State Bd. of Elections</i> , 2011 WL 4837508, at *9 (N.D. Ill. Oct. 12, 2011)); document may "'reveal[] an awareness' of: racial considerations employed in the districting process, sorting of voters according to race, or the impact of redistricting upon the ability of minority voters to elect a candidate of choice" (<i>Id.</i> at 344); document could "reflect a violation of the Equal Protection Clause of the Fourteenth Amendment" (<i>City of Greensboro v. Guilford Cnty. Bd. of Elections</i> , 2016 WL 11660626, at *5 (M.D.N.C. Dec. 20, 2016)). Not a WPP because the document does not appear to be for the purpose of legal advice; legislative counsel cannot "withhold documents pertaining to pending legislation" (<i>Bethune-Hill</i> , 144 F. Supp. 3d at 348); document was created in the "ordinary course" of legislation. (<i>Id.</i>); a communication is not AWP
546	Patrick Dennis	Haley Mottel			'--- Untitled Document ---	12/29/21	Privileged	Work Product	Communication between staff counsel with draft work product for review.	Same
547					First Monday Draft.docx	12/29/21	Privileged	Work Product	Attachment to communication between staff counsel with draft work product for review.	Same
548	Patrick Dennis	Haley Mottel			FW: DRAFT: First Monday 2022 remarks	12/29/21	Privileged	Work Product	Communication between staff counsel with draft work product for review.	Same
549					22.01.03 First Monday speech.docx	12/29/21	Privileged	Work Product	Communication between staff counsel with draft work product for review.	Lacks sufficient information but appears to be communication/documentation in the ordinary course of legislation, not privileged ACC -- legislative counsel cannot "withhold documents pertaining to pending legislation" (<i>Bethune-Hill</i> , 144 F. Supp. 3d at 348)
550	Patrick Dennis	James H. Lucas; Haley Mottel; Nicolette Walters			Fwd:	12/29/21	Privileged	Attorney-Client Communication; Work Product	Communication between staff counsel and legislator with draft work product for review.	Same

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
551					2022 First Monday Draft 2.0.docx	12/29/21	Privileged	Work Product	Attachment to communication between staff counsel and legislator with draft work product for review.	Same
552	Patrick Dennis	Haley Mottel	James H. "Jay" Lucas; Nicolette Walters		Re: Updated Working Draft	12/30/21	Privileged	Attorney-Client Communication; Work Product	Communication between staff counsel, legislator and legislative staff with draft work product for review.	Same
553					2022 First Monday Draft.12.30.21.docx	12/30/21	Privileged	Attorney-Client Communication; Work Product	Attachment to communication between staff counsel, legislator and legislative staff with draft work product for review.	Same
554	Patrick Dennis	James H. "Jay" Lucas; Chris Murphy; Wallace Jordan			"REDACTED"	12/31/21		Attorney-Client Communication; Work Product	Communication regarding work product and legal advice from outside counsel	Defendants have not not provided sufficient information to make a privilege determination, but does appear to be for the purpose of legal advice and thus protected as ACC/WP.
555					"REDACTED"	12/31/21		Attorney-Client Communication; Work Product	Attachment to communication regarding work product and legal advice from outside counsel	Same
556	Patrick Dennis	Patrick Dennis			Fwd: Updated Draft	1/2/22	Privileged	Work Product	Communication forwarding draft work product for review	Lacks sufficient information to make a privilege determination. Defendants "bear the burden of showing that the attorney-client privilege applies." <i>Bethune-Hill</i> , 114 F. Supp. 3d at 347. Defendant "bears the burden to show that the 'work product' was prepared in anticipation of litigation." (<i>RLI Ins. Co. v. Conseco, Inc.</i> , 477 F. Supp. 3d 741, 749 (E.D. Va. 2007)). However, to the extent that the document contains a draft map or other supporting documentation, must be produced pursuant to the Court's Order. As "[a]ll versions of maps and related documents produced during the course of the development, design, and/or revisions of H. 4493 and sufficient data to determine the date and time such maps were produced and the persons involved in submitting and reviewing them" are subject to discovery.
557					2022 First Monday Draft.1.2.22.docx	1/2/22		Work Product	Attachment to communication forwarding draft work product for review	Lacks sufficient information to make a privilege determination. Defendants "bear the burden of showing that the attorney-client privilege applies." <i>Bethune-Hill</i> , 114 F. Supp. 3d at 347. Defendant "bears the burden to show that the 'work product' was prepared in anticipation of litigation." (<i>RLI Ins. Co. v. Conseco, Inc.</i> , 477 F. Supp. 3d 741, 749 (E.D. Va. 2007)).
558					2022 First Monday Draft.1.2.22.pdf	1/2/22		Work Product	Attachment to communication with draft work product for review	Same
559	Patrick Dennis	Richard Pearce			'--- Untitled Document ---	8/10/21		Attorney-Client Communication	Communication between staff counsel regarding redistricting update	Same -- "redistricting update" appears to be related to pending legislation and not litigation or legal advice.

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
560	Patrick Dennis	James H. Lucas; Patrick Dennis; Haley Mottel			Sine Die Adjournment	9/21/21	Privileged	Attorney-Client Communication; Work Product	Communication to legislator with legal discussion	Lacks sufficient information to make a privilege determination, based on the subject line of the email correspondence, this appears to be communication/documentation in the ordinary course of legislation, not privileged ACC -- legislative counsel cannot "withhold documents pertaining to pending legislation" (See <i>Bethune-Hill</i> , 144 F. Supp. 3d at 348)
561	Patrick Dennis	Bill Taylor			Fwd: Sine Die Adjournment	9/28/21		Attorney-Client Communication	Communication to legislator with legal discussion	Same
562	Patrick Dennis	Bill Taylor			FW: Sine Die Adjournment	9/28/21		Attorney-Client Communication	Communication to legislator with legal discussion	Same
563	Patrick Dennis	James H. "Jay" Lucas; Haley Mottel			FW: Civil Rights Groups File Federal Lawsuit Over South Carolina Redistricting Failures	10/12/21		Attorney-Client Communication	Communication regarding litigation	Lacks sufficient information to make a privilege determination, but does appear to be related to legal advice and/or pending litigation.
564	Patrick Dennis	Charles Reid			Re: "REDACTED"	10/12/21		Attorney-Client Communication; Work Product	Communication regarding litigation between counsel	Lacks sufficient information to make a privilege determination. Defendants "bear the burden of showing that the attorney-client privilege applies." <i>Bethune-Hill</i> , 114 F. Supp. 3d at 347. Defendant "bears the burden to show that the 'work product' was prepared in anticipation of litigation." (<i>RLI Ins. Co. v. Conseco, Inc.</i> , 477 F. Supp. 3d 741, 749 (E.D. Va. 2007)).
565	Patrick Dennis	Charles Reid			Re: "REDACTED"	10/12/21		Attorney-Client Communication; Work Product	Communication regarding litigation between counsel	Same
566	Patrick Dennis	Charles Reid			Re: "REDACTED"	10/12/21		Attorney-Client Communication; Work Product	Communication regarding litigation between counsel	Same
567	Patrick Dennis	Charles Reid			Re: "REDACTED"	10/12/21		Attorney-Client Communication; Work Product	Communication regarding litigation between counsel	Same
568	Patrick Dennis	Charles Reid			Re: "REDACTED"	10/12/21		Attorney-Client Communication; Work Product	Communication regarding litigation between counsel	Same
569	Patrick Dennis	Nicolette Walters			RE: Zak Koeske Qs	10/15/21		Attorney-Client Communication; Work Product	Communication with work product legal advice	Same
570	Patrick Dennis	Haley Mottel			FW: Zak Koeske Qs	10/15/21		Attorney-Client Communication; Work Product	Communication with work product legal advice	Same
571	Patrick Dennis	Charles Reid			RE: Speaker Lucas Calling the House into Statewide Session Beginning 2:00 pm, Wednesday, December 1, 2021	11/17/21		Attorney-Client Communication; Work Product	Communication between staff counsel regarding planning for legislation	Based on the subject line of the email correspondence, this appears to be communication/documentation in the ordinary course of legislation, not privileged ACC -- legislative counsel cannot "withhold documents pertaining to pending legislation" (<i>Bethune-Hill</i> , 144 F. Supp. 3d at 348)

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Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
572	Patrick Dennis	Ashley Harwell-Beach; Charles Reid			RE: Rules Committee - Special Order Redistricting	11/23/21		Attorney-Client Communication; Work Product	Communication between staff counsel regarding process planning for legislation	Same
573	Patrick Dennis	Charles Reid; Ashley Harwell-Beach			RE: Rules Committee - Special Order Redistricting	11/23/21		Attorney-Client Communication; Work Product	Communication between staff counsel regarding process planning for legislation	Same
574	Patrick Dennis	Julia Foster			'--- Untitled Document ---	12/8/21		Attorney-Client Communication; Work Product	Communication between staff counsel regarding process planning for legislation	Lacks sufficient information but appears to be communication/documentation in the ordinary course of legislation, not privileged ACC -- legislative counsel cannot "withhold documents pertaining to pending legislation" (<i>See Bethune-Hill</i> , 144 F. Supp. 3d at 348)
575					7524AHB21.pdf	12/8/21		Attorney-Client Communication; Work Product	Attachment to communication between staff counsel regarding process planning for legislation	Same
576	Patrick Dennis	Julia Foster			FW: Special Order Draft	12/8/21		Attorney-Client Communication; Work Product	Communication between staff counsel regarding process planning for legislation	Same
577					7524AHB21.docx	12/8/21		Attorney-Client Communication; Work Product	Attachment to communication between staff counsel regarding process planning for legislation	Same
578	Nicolette Walters	Patrick Dennis			Fwd: DRAFT: First Monday 2022 remarks	12/21/21		Attorney-Client Communication; Work Product	Communication between staff counsel and legislative staff with draft work product for review	Same
579					22.01.03 First Monday speech.docx	12/21/21		Attorney-Client Communication; Work Product	Attachment to communication between staff counsel and legislative staff with draft work product for review	Same
580	Haley Mottel	Patrick Dennis; James H. "Jay" Lucas; Nicolette Walters			RE: Fiscal/Tax talking points	12/30/21		Attorney-Client Communication; Work Product	Communication between staff counsel, legislator and legislative staff with draft work product for review	Same
581					2022 First Monday Draft.12.30.21.docx	12/30/21		Attorney-Client Communication; Work Product	Attachment to communication between staff counsel, legislator and legislative staff with draft work product for review	Same
582	Haley Mottel	James H. "Jay" Lucas; Patrick Dennis; Nicolette Walters			Updated Working Draft	12/30/21		Attorney-Client Communication; Work Product	Communication between staff counsel, legislator and legislative staff with draft work product for review	Same
583					2022 First Monday Draft.12.30.21.docx	12/30/21		Attorney-Client Communication; Work Product	Attachment to communication between staff counsel, legislator and legislative staff with draft work product for review	Same

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants										
Number	Email From	Email To	Email CC	Email BCC	Subject/Title	Date	Legislative Privilege	Attorney-Client/Work Product	Privilege Log Description	Privilege Challenged Basis
584	Chris Murphy	Patrick Dennis	James H. "Jay" Lucas; Wallace Jordan		Re: "REDACTED"	12/31/21		Attorney-Client Communication; Work Product	Communication regarding litigation	Lacks sufficient information to make a privilege determination. Defendants "bear the burden of showing that the attorney-client privilege applies." <i>Bethune-Hill</i> , 114 F. Supp. 3d at 347. Defendant "bears the burden to show that the 'work product' was prepared in anticipation of litigation." (<i>RLI Ins. Co. v. Conseco, Inc.</i> , 477 F. Supp. 3d 741, 749 (E.D. Va. 2007). Does appear to be related to legal advice and/or pending litigation.
585					"REDACTED"	12/31/21		Attorney-Client Communication; Work Product	Attachment to communication regarding litigation	Same
586	Haley Mottel	Patrick Dennis			RE:	12/29/21		Attorney-Client Communication; Work Product	Communication between staff counsel with draft work product for review	Same
587					2022 First Monday Draft.docx	12/29/21		Attorney-Client Communication; Work Product	Attachment to communication between staff counsel with draft work product for review	Same
588	Haley Mottel	Patrick Dennis; Nicolette Walters			Updated Speech	1/1/22		Attorney-Client Communication; Work Product	Communication between staff counsel and legislative staff with draft work product for review	Lacks sufficient information but appears to be communication/documentation in the ordinary course of legislation, not privileged ACC -- legislative counsel cannot "withhold documents pertaining to pending legislation" (<i>See Bethune-Hill</i> , 144 F. Supp. 3d at 348)
589					2022 First Monday Draft.1.1.22.docx	1/1/22		Attorney-Client Communication; Work Product	Attachment to communication between staff counsel and legislative staff with draft work product for review	Same
590	Patrick Dennis	Charles Reid; Haley Mottel; Nicolette Walters			RE: reapportionment expenses	7/19/21		Attorney-Client Communication	Communication among staff counsel regarding request for information	Based on the subject line of the email correspondence, this appears to be communication/documentation in the ordinary course of legislation, not privileged ACC -- legislative counsel cannot "withhold documents pertaining to pending legislation" (<i>Bethune-Hill</i> , 144 F. Supp. 3d at 348)
591	Patrick Dennis	Charles Cannon; Gary Simrill	Patrick Dennis		DRAFT email "REDACTED"	7/23/21	Privileged	Attorney-Client Communication	Communication among staff counsel and legislator with draft notice	Lacks sufficient information to make a privilege determination; defendants burden to show privilege applies; but appears to be documentation created in the ordinary course of legislation and thus not protected as ACC.

South Carolina State Conference of the NAACP, et al. v. McMaster, et al. Case No. 3:21-cv-03302-JMC-TJH-RMG Privilege Log of House Defendants (<i>Preliminary Draft-Subject to Revision</i>)								
Doc ID/Range(s)	Date	Recipient(s)	Author(s)	Document Type/Title	Subject/Description	Privilege	Basis for Privilege	Privilege Challenged Basis
MAP1-260	Various	Redistricting Ad Hoc Committee	Members of SC House	Maps	Printouts of individual House Districts drawn by legislators prior to adoption of working draft staff plan	Legislative	Map image printed at conclusion of a House Member's map room drawing session	Document/communication constitutes "All versions of maps and related documents produced during the course of the development, design, and/or revisions of H. 4493" and, pursuant to the Court's Order (ECF No. 153) must be produced. This communication may also reveal Defendants' "intent behind any proposed design and/or revision of the H. 4493 or any individual district referenced in Plaintiffs' Amended Complaint." Also, appears to contain "strictly factual information" and/or non-privileged information that were relied upon by legislators (See e.g., <i>Bethune-Hill v. Va. State Bd. of Elections</i> , 144 F. Supp. 2d 323, 343 (E.D. Va. 2015) (citing <i>Comm. for Fair and Balanced Maps v. Ill. State Bd. of Elections</i> , 2011 WL 4837508, at *9 (N.D. Ill. Oct. 12, 2011)); document may "'reveal[] an awareness' of: racial considerations employed in the districting process, sorting of voters according to race, or the impact of redistricting upon the ability of minority voters to elect a candidate of choice" (<i>Id.</i> at 344); document could "reflect a violation of the Equal Protection Clause of the Fourteenth Amendment" (<i>City of Greensboro v. Guilford Cnty. Bd. of Elections</i> , 2016 WL 11660626, at *5 (M.D.N.C. Dec. 20, 2016).
MAP261-516	Various	Redistricting Ad Hoc Committee	Members of SC House	Population data spreadsheets	Population data details for maps labeled MAP1-260	Legislative	Population data details for map images printed at conclusion of a House Member's drawing session	Same
REL00004081	11/5/2021		Emma Dean	Map Room Schedule .xlsx	Master map room scheduling document	Attorney/Client	Scheduling document created and maintained by staff counsel	Document/communication constitutes "All versions of maps and related documents produced during the course of the development, design, and/or revisions of H. 4493" and, pursuant to the Court's Order (ECF No. 153) must be produced. This communication may also reveal Defendants' "intent behind any proposed design and/or revision of the H. 4493 or any individual district referenced in Plaintiffs' Amended Complaint." Not protected by AC because communication does not appear to be for the purpose of legal advice but rather is documentation created in the ordinary course of legislation and appears to be strictly factual information -- perhaps a schedule outlining use of map room. legislative counsel cannot "withhold documents pertaining to pending legislation" (<i>Bethune-Hill</i> , 144 F. Supp. 3d at 348)
REL00011180	9/27/2021	Emma Dean	Emma Dean	Email	Tuesday's meeting	Attorney/Client	Email from staff counsel to staff counsel forwarding draft procedures document	Same
REL00011180.0001	9/27/2021			Document Attachment	Draft Map Room Procedures.pdf	Attorney/Client	Draft map room procedures document	Same
REL00011459	9/27/2021	Linda Anderson	Emma Dean	Email	Notebook	Attorney/Client	Draft map room procedures document sent by staff counsel to admin for printing	Same
REL00011459.0001	9/27/2021			Document Attachment	Draft Map Room Procedures.pdf	Attorney/Client	Draft map room procedures document	Same
REL00011461	9/29/2021	Linda Anderson	Emma Dean	Email	Map room procedures	Attorney/Client	Email from staff counsel to admin forwarding document	Same
REL00011461.0001	9/29/2021			Document Attachment	Map Room Procedures.odf	Attorney/Client	Map room procedures document	Same
REL00011467	11/8/2021	Patrick Dennis	Emma Dean	Email	Redistricting	Attorney/Client	Notification communication between staff counsel	Insufficient information but does not appear to be communication protected by AC privilege -- appears to be communication pertaining to pending legislation
REL00011470	11/22/2021	Patrick Dennis	Emma Dean	Email	FW: Redistricting	Attorney/Client	Notification communication between staff counsel	Same
REL00011522	10/21/2021	Emma Dean	Linda Anderson	Email	Rep. J. A. Moore	Attorney/Client	Admin forwarding message to staff counsel	Same

REL00011523	11/2/2021	Emma Dean kimjohnsonms w@yahoo.com	Robin Heatwole	Email	District 64 Map	Attorney/Client Legislative	Request for information from legislative aide on behalf of legislator to staff counsel	Document/communication constitutes "All versions of maps and related documents produced during the course of the development, design, and/or revisions of H. 4493" and, pursuant to the Court's Order (ECF No. 153) must be produced. This communication may also reveal Defendants' "intent behind any proposed design and/or revision of the H. 4493 or any individual district referenced in Plaintiffs' Amended Complaint." Requested information related to district 64 map appears to be "strictly factual information" and/or non-privileged information that was relied upon by legislators (Bethune-Hill v. Va. State Bd. of Elections, 144 F. Supp. 2d 323, 343 (E.D. Va. 2015) (citing <i>Comm. for Fair and Balanced Maps v. Ill. State Bd. of Elections</i> , 2011 WL 4837508, at *9 (N.D. Ill. Oct. 12, 2011)); document should be produced because it may "reveal[] an awareness" of: racial considerations employed in the districting process, sorting of voters according to race, or the impact of redistricting upon the ability of minority voters to elect a candidate of choice" (<i>Id.</i> at 344); document could "reflect a violation of the Equal Protection Clause of the Fourteenth Amendment" (<i>City of Greensboro v. Guilford Cnty. Bd. of Elections</i> , 2016 WL 11660626, at *5 (M.D.N.C. Dec. 20, 2016).
REL00011524	11/3/2021	Emma Dean	Linda Anderson	Email	Rep. Kim Johnson	Attorney/Client Legislative	Admin notifying staff counsel of message	Lacks sufficient information to make a privilege determination. Defendants "bear the burden of showing that the attorney-client privilege applies." <i>See Bethune-Hill</i> , 114 F. Supp. 3d at 347.
REL00011525	11/8/2021	Emma Dean	Linda Anderson	Email	Rep. Hart	Attorney/Client Legislative	Admin notifying staff counsel of message	Same
REL00011526	11/5/2021	Emma Dean	Linda Anderson	Email	Rep. Oremus	Attorney/Client Legislative	Admin notifying staff counsel of message	Same
REL00011527	11/8/2021	Emma Dean	Linda Anderson	Email	Rep. Hart	Attorney/Client Legislative	Admin notifying staff counsel of message	Same
REL00011528	11/9/2021	Emma Dean	Deon Tedder	Email	Proposed Map	Attorney/Client Legislative	Request for information from legislator to staff counsel	Document/communication constitutes "All versions of maps and related documents produced during the course of the development, design, and/or revisions of H. 4493" and, pursuant to the Court's Order (ECF No. 153) must be produced. This communication may also reveal Defendants' "intent behind any proposed design and/or revision of the H. 4493 or any individual district referenced in Plaintiffs' Amended Complaint." Request for information related to "proposed map" appears to be "strictly factual information" and/or non-privileged information that was relied upon by legislators (Bethune-Hill v. Va. State Bd. of Elections, 144 F. Supp. 2d 323, 343 (E.D. Va. 2015) (citing <i>Comm. for Fair and Balanced Maps v. Ill. State Bd. of Elections</i> , 2011 WL 4837508, at *9 (N.D. Ill. Oct. 12, 2011)); document should be produced because it may "reveal[] an awareness" of: racial considerations employed in the districting process, sorting of voters according to race, or the impact of redistricting upon the ability of minority voters to elect a candidate of choice" (<i>Id.</i> at 344); document could "reflect a violation of the Equal Protection Clause of the Fourteenth Amendment" (<i>City of Greensboro v. Guilford Cnty. Bd. of Elections</i> , 2016 WL 11660626, at *5 (M.D.N.C. Dec. 20, 2016).
REL00011529	11/10/2021	Emma Dean idanin@comcast.net	Joseph S. •Joe' Daning	Email	Amendment for House Dist. 92	Attorney/Client Legislative	Request for assistance from legislator to staff counsel	Insufficient information to make a privilege determination but appears to relate to strictly factual information and/or documentation related to pending legislation -- legislative counsel cannot "withhold documents pertaining to pending legislation" (Bethune-Hill, 144 F. Supp. 3d at 348). If document/communication constitutes "All versions of maps and related documents produced during the course of the development, design, and/or revisions of H. 4493" or reveals "intent behind any proposed design and/or revision of the H. 4493 or any individual district referenced in Plaintiffs' Amended Complaint" it must be produced pursuant to the Court's Order (ECF No. 153).
REL00011533	11/12/2021	Emma Dean	repanderson	Email	RE: FW: Redistricting	Attorney/Client Legislative	Communication from legislator to staff counsel regarding map	Same
REL00011653	9/27/2021	Emma Dean; Jay Jordan; Justin Bamberg; jelliott@jasone lliottlaw.com	Emma Dean	Email	Tuesday's Meeting	Legislative	Communication from staff counsel to legislators with draft map room procedures document	Document/communication appears to constitute "All versions of maps and related documents produced during the course of the development, design, and/or revisions of H. 4493" and, pursuant to the Court's Order (ECF No. 153), must be produced. This communication may also reveal Defendants' "intent behind any proposed design and/or revision of the H. 4493 or any individual district referenced in Plaintiffs' Amended Complaint."
REL00011653.0001	9/27/2021			Document Attachment	Draft Map Room Procedures.pdf	Legislative	Draft map room procedures document	Same
REL00011662	8/12/2021	Jay Jordan	Emma Dean	Email	Draft letter	Attorney/Client Legislative	Communication from staff counsel to legislator forwarding draft letter for review	Same

REL00011662.0001	8/12/2021			Document Attachment	8.13.21 Letter.pdf	Attorney/Client Legislative	Draft letter regarding redistricting process for review	Insufficient information to make a privilege determination; defendants bear the burden to establish privilege; nonetheless, documentation "regarding redistricting process for review" does not appear to be privileged AC communication as it relates to pending legislation; even if between legislators, the communication could relate to strictly factual information. If document/communication constitutes "All versions of maps and related documents produced during the course of the development, design, and/or revisions of H. 4493" or reveals "intent behind any proposed design and/or revision of the H. 4493 or any individual district referenced in Plaintiffs' Amended Complaint" it must be produced pursuant to the Court's Order (ECF No. 153).
REL00011663	9/20/2021	Jay Jordan	Emma Dean	Email	Draft notice and agenda Sept 28	Attorney/Client Legislative	Communication from staff counsel to legislator forwarding draft agenda	Appears to be communication/documentation created in the ordinary course of legislation, not privileged ACC -- legislative counsel cannot "withhold documents pertaining to pending legislation" (<i>Bethune-Hill</i> , 144 F. Supp. 3d at 348); an "agenda" would appear to be strictly factual information (<i>Id.</i> at 343). Insufficient information to make a determination, but if document/communication constitutes "All versions of maps and related documents produced during the course of the development, design, and/or revisions of H. 4493" or reveals "intent behind any proposed design and/or revision of the H. 4493 or any individual district referenced in Plaintiffs' Amended Complaint" it must be produced pursuant to the Court's Order (ECF No. 153).
REL00011663.0001	9/20/2021			Document Attachment	Draft notice and agenda Sept 28.docx	Attorney/Client Legislative	Draft notice and agenda document from staff counsel	Same
REL00011666	9/24/2021	Chris Murphy	Emma Dean	Email	Updated draft	Attorney/Client Legislative	Communication from staff counsel to legislator forwarding updated draft map room procedures	Appears to be communication/documentation created in the ordinary course of legislation, not privileged ACC -- legislative counsel cannot "withhold documents pertaining to pending legislation" (<i>Bethune-Hill</i> , 144 F. Supp. 3d at 348); updated draft map procedures appears to be strictly factual information that was relied upon by legislators (<i>Id.</i> at 343). Insufficient information to make a determination, but if document/communication constitutes "All versions of maps and related documents produced during the course of the development, design, and/or revisions of H. 4493" or reveals "intent behind any proposed design and/or revision of the H. 4493 or any individual district referenced in Plaintiffs' Amended Complaint" it must be produced pursuant to the Court's Order (ECF No. 153).
REL00011666.0001	9/24/2021			Document Attachment	Draft Map Room Procedures.pdf	Attorney/Client Legislative	Draft map room procedures document	Same
REL00011669	9/24/2021	Jay Jordan	Emma Dean	Email	Draft for your review	Attorney/Client Legislative	Communication from staff counsel to legislator proposing notice and forwarding updated draft map room procedures	same
REL00011669.0001	9/29/2021			Document Attachment	Map Room Procedures.pdf	Attorney/Client Legislative	Map room procedures document	same